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March 30, 2020

By ECF/Email

Honorable Victor Marrero
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 3/31/2020

Re: United States v. Dragomir Ceranic, 19 Cr. 605 (VM)

Honorable Judge Marrero:

We write on behalf of our client Dragomir Ceranic, with the consent of the Government, and at the recommendation of U.S. Pretrial Officer Leo Barrios, to request that you modify Mr. Ceranic's bond by striking the condition of electronic monitoring. Mr. Ceranic has had no issues on pretrial release since his arrest in early September. He works as a truck driver in the food industry and is therefore an "essential employee" for purposes of our region's current COVID-19-related quarantine. Again, the Government joins in this request, which was prompted by Mr. Ceranic's Pretrial Officer. Thank you for your consideration.

Respectfully submitted,

/s/
Robert M. Baum
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Assistant Federal Defender
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cc: AUSA Jason Swergold

